



OSHA REGIONAL NOTICE

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

DIRECTIVE NUMBER: CPL 16/09 (CPL 04)	EFFECTIVE DATE: February 4, 2016
SUBJECT: Regional Emphasis Program for Safety Hazards in Auto Parts Industry – NAICS 3363XX (Motor Vehicle Parts Manufacturing)	
REGIONAL IDENTIFIER: Atlanta Regional Notice	

ABSTRACT

Purpose: The purpose of this instruction is to continue a Regional Emphasis Program to reduce workplace exposures to safety hazards associated in the Auto Parts Supplier Industry.

Scope: This Notice applies to Atlanta East, Atlanta West, Birmingham, Jackson, and Mobile Area Offices.

References: OSHA Notice CPL 02-00-159, Field Operations Manual
OSHA Instruction CPL 02-00-025, Scheduling Systems for Programmed Inspections
OSHA Instruction CPL 04-00-001, Procedures for Approval of Local Emphasis Programs (LEP's) and Experimental Programs
OSHA Instruction CPL 02-00-051, Enforcement Exemptions and Limitations under the Appropriations Act

Cancellations: None

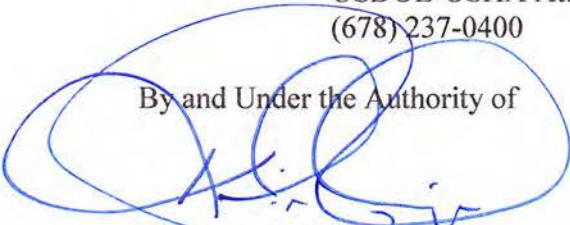
State Impact: None

Action Offices: Atlanta East, Atlanta West, Birmingham, Jackson, and Mobile Area Offices

Originating Office: Atlanta Regional Office

Contact: Assistant Regional Administrator for Enforcement Programs
USDOL-OSHA Atlanta Regional Office
(678) 237-0400

By and Under the Authority of



KURT A. PETERMEYER
Regional Administrator

Executive Summary

This instruction continues a Regional Emphasis Program to reduce safety hazard exposures in the Auto Parts Supplier Industry. The REP ensures effective targeting, in the enforcement of safety hazards and outreach for hazardous working conditions in this industry. The most common causes of injury in this industry are Lock Out/Tag Out, Machine Guarding, and Electrical Hazards.

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- I. **SUBJECT:** Regional Emphasis Program for safety hazard exposures in the Auto Parts Supplier Industry.
- II. **PURPOSE:** The purpose of this instruction is to continue a Regional Emphasis Program to reduce workplace exposures to safety and health hazards associated with the Auto Parts Supplier Industry.
- III. **SCOPE:** This REP applies to the Atlanta East, Atlanta West, Birmingham, Jackson and Mobile area offices.
- IV. **REFERENCES:**
OSHA Notice CPL 02-00-159, Field Operations Manual
OSHA Instruction CPL 02-00-025, Scheduling Systems for Programmed Inspections
OSHA Instruction CPL 04-00-001, Procedures for Approval of Local Emphasis Programs (LEP's) and Experimental Programs
OSHA Instruction CPL 02-00-051, Enforcement Exemptions and Limitations under the Appropriations Act
- V. **EXPIRATION:** This notice expires one year from the effective date, unless extended.
- VI. **ACTION:** OSHA compliance personnel shall follow the procedures contained in this notice when conducting outreach and enforcement activities.
- VII. **BACKGROUND:** The REP was established to reduce employee exposures to safety related hazards in the Automotive Parts Supplier Industry. Hazards associated with the Auto Parts Supplier Industry that are the focus of this REP continue to be the source of serious injuries, including amputations, and deaths to employees. Establishments in NAICS code 3363xx manufacture motor vehicle parts. Workers in this industry are exposed to caught-in, crushing, struck-by and electrical hazards due to the machinery utilized in the making of these parts.

A partnership was established in 2005 with Hyundai and Tier-One Suppliers. The partnership was developed to encourage employers to establish and implement a Safety and Health Program. At the time, there were approximately 17 Tier-One companies. The partnership was renewed and Tier-Two companies were allowed to join as the industry continued to grow in Alabama, Mississippi, and Georgia. In the 2006 partnership evaluation, it was noted that over 4000 employees received training that year. However, due to the increased inspection activity (with violations) of the participants, the partnership was cancelled.

Based on the evaluation of the inspection data for the industry from October 1, 2010 through February 6, 2013 for three area offices in Alabama and Georgia, 126 inspections were conducted. Fifty of the 126 inspections were the result of complaints. Twenty-six of those inspections resulted in violations of Lockout/Tagout and Machine Guarding standards. Less than 20% of the 50 complaint inspections were found to be in compliance. Additionally, two of those 126 inspections were the result of fatal incidents. In both cases, employees performing maintenance were caught in equipment that became energized and they were crushed. Two inspections resulted in significant cases with penalties in excess of \$100,000.

Data from the Bureau of Labor Statistics (BLS) shows that in 2010 the auto parts supplier industry in Alabama had a higher injury and illness rate – 4.6 per 100 full-time workers – than the same industry nationwide which had a rate of 3.0 per 100 full time workers, meaning the injury and illness rate in Alabama was 50% higher than the same industry across the country in 2010.

A review of OIS data from October 1, 2011 to September 30, 2014 revealed that a total of 158 inspections in this industry were completed. Of the 105 inspections that were not in compliance, more than 90% of them resulting in Serious and Repeat violations. More than 350 violations were cited. Fifty-seven violations were associated with lockout/tagout; 72 violations were associated with machine guarding and 42 violations were associated with electrical hazards.

In FY-15, Region IV conducted 37 inspections. One hundred and seventy-two total violations were cited, including 36 violations associated with machine guarding and 26 violations associated with lockout/tagout standards.

This REP will continue to heighten health and safety awareness within the industry and encourage employers to take steps voluntarily to correct hazards and come into compliance with current safety and health regulations and practices. Because of the industry is concentrated in Alabama, Georgia, and Mississippi, the REP is implemented to focus on those jurisdictions affected.

- VIII. **PROCEDURES:** Inspections conducted under this program shall be scheduled and conducted pursuant to the following criteria:
- A. **Outreach:** The area offices will mail the letter in Appendix A to each employer initially appearing on their establishment list or added to their establishment list at a later date to inform them of this outreach and targeting plan, no later than **15 days** after this emphasis program becomes effective. The Area Directors will provide educational and compliance assistance information relevant to the industry along with other applicable outreach materials to appropriate stakeholders (employers, employees, unions and trade associations) to explain this REP and the hazards associated with the Auto Supplier Industry. Compliance Assistance Specialists and Area Directors will include information about this emphasis program in all of their outreach efforts, as well as providing information on the hazards of the industry, such as the major safety hazards associated with the industry.
 - B. **Enforcement:** All inspections under this program will be comprehensive safety inspections, focusing particularly on Lock Out/Tag Out, Machine Guarding and Electrical Hazards. Additionally, health hazards are to be addressed by the compliance officer conducting the inspection with a referral to be made to an Industrial Hygienist. The referral inspection is to be opened within 5 working days.
 - C. **Scheduling:** All inspection activity will begin thirty days after the outreach and notification letters have been mailed to the employers in order to give employers the opportunity to contact consultation services for an on-site visit. Each of the affected Area Directors will compile and maintain a list of establishments in NAICS Code for establishments within their jurisdictional area. This list will be developed from various sources available to the Area Office, including OSHA inspection history from OSHA's inspection database, automobile

manufacturers, the internet, local knowledge and available manufacturer's directories.

1. **Inspections:** Following the outreach period, each Area Office will have two years to complete the safety inspections for all of the companies identified by this REP. If an establishment becomes known after the list is completed, it will be added at the end of the list. Those establishments covered by this REP which have received a **comprehensive** safety inspection within the past two years from the effective date of this REP will be deleted from the list. Establishments which are found to not operate under this NAICS will be deleted from the listing and a NO INSPECTION report shall be submitted into the OIS, unless the facility is also covered by another emphasis program. In that case, the inspection may be conducted under the applicable emphasis program. All establishments, with 10 or more employees, will be inspected. Based upon observations and information obtained during the inspection, assistance may be requested for technical or specialized support.
 2. **Unprogrammed Inspections:** All fatalities, complaints and referrals will be handled according to the FOM. If the occasion for an unprogrammed (i.e., complaint, fatality, amputations, hospitalizations, loss of an eye, etc.) inspection arises with respect to an establishment that is also on the REP's inspection list to receive a programmed inspection under this REP, the two inspections may be conducted either concurrently or separately.
 3. **Site Specific Targeting (SST):** SST sites will be handled according to the most current OSHA Notice which outlines procedures for conducting programmed inspections based on site-specific targeting information.
- D. **Sampling Requirements:** Inspecting industrial hygiene compliance officers shall be prepared to perform any required sampling at the time the referral inspection is initiated (within 5 days of receipt from a safety compliance officer) if the referral is based on potential airborne contaminants or issues related to noise exposure. If sampling cannot be performed, the reasons shall be discussed with the Area Director and concurrence received. This information shall be documented in the case file narrative.
- E. **Citations:** Violations will be cited according to the FOM and other guidance documents, such as current directives.
- F. **Recording in OIS:** The Inspection Forms shall be coded as local emphasis program (LEP) inspections, and marked "AUTOSUP".
- G. **Evaluation:** By October 30th of each year, an evaluation report shall be conducted that includes:
1. The goal of the program.
 2. The Area Director's opinion of how effective the program was in meeting its goals.
 3. Data and information used to support the conclusions stated above. Data may include enforcement statistics, serious hazards identified, and any impact on covered, non-inspected employers.
 4. Specific data on citations issued related to lock out/tag out, machine guarding and electrical hazards.
 5. Statement and rationale of whether the program should be continued.
 6. Description of any legal issues that arose which would necessitate a review by the

- Solicitor before renewal of the program.
7. Any other comments or recommendations, including findings, which might have an impact on how the industry conducts business.
 8. Number of outreach sessions in which this emphasis program is addressed.

DISTRIBUTION: Atlanta East, Atlanta West, Birmingham, Jackson and Mobile Area Offices
Enforcement Programs
Cooperative and State Programs
Administrative Programs
Regional Solicitor
Region IV Intranet Website

APPENDIX A
SAMPLE OUTREACH LETTER

Dear Stakeholder:

The Occupational Safety and Health Administration (OSHA) has initiated a Regional Emphasis Program (REP) focusing on hazards related to automotive supply manufacturing operations. As a result of this, the *(Area Office Name)* Area Office will be conducting inspections of workplaces that have been identified as having operations and possible worker exposures to common hazards found in this industry. The most common causes of injury are machine guarding, lockout/tagout (LOTO), and electrical hazards. We are notifying you of our intent to conduct these inspections because your company may be covered by this emphasis program.

OSHA continues to offer compliance assistance focusing on prevention of occupational injuries and illnesses. As part of this new emphasis program, compliance assistance products are readily available to assist your company in enhancing its safety and health program. You can obtain information about electrical safety, emergency action plans, hazard communication, hearing conservation and noise, lockout/tagout, machine guarding, respiratory protection, and safety and health programs from OSHA's website at www.osha.gov. Specific information about the hazards of working in manufacturing facilities can be obtained from OSHA's area offices. If you do not have access to the Internet, please contact our office and we will provide copies of this information to you. You may contact our office at any time for further assistance: *(insert phone number and address for the Area Office)*.

OSHA also offers a free Consultation Service under Section 21(d) of the Occupational Safety and Health Act to small employers. The 21(d) Consultation Service helps employers to identify (and correct) potential hazards at their worksites and improve their occupational safety and health management systems. This service is delivered by universities using well-trained safety and health professionals. To schedule this consultation service, please contact the 21(d) Consultation Program at:

(Insert contact information for the local Consultation Program including the Address and Telephone Number for the State Consultation Program)

Your interest in protecting your employees from safety and health hazards is appreciated.

Sincerely,

Area Director